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April 12, 2012

Valerie Cairns
Counsel for Defendant

re: State v. Joseph Franklin Reynolds, DC-11-207B

Dear Valerie,

The State proposes the following negotiated disposition of this matter:

- 1) Defendant will plead guilty to Counts 1 through 4. He will state facts sufficient for the Court to accept his plea. The State will move to dismiss Counts 5 and 6 of the information.
- 2) As to sentencing, the State and the Defendant will recommend, as to Counts 1-4, that that the Court defer imposition of sentence for a period of 6 years on standard conditions, including registration as a Level 1 sexual offender, successful completion of outpatient sex offender treatment, service of 30 days in jail, and compliance with all standard conditions of supervision.
- 3) This agreement is conditioned upon the defendant's compliance with all laws and conditions of release pending sentencing. Should the defendant violate any law or condition of release prior to sentencing, the State will be free to make whatever sentencing recommendation it deems appropriate. The determination of whether your client has obeyed all laws is solely within the discretion of the County Attorney's Office. Your client has no right to challenge that determination.

This agreement is reached pursuant to Section 46-12-211(1)(c), MCA, and is not binding upon the Court. Should the Court choose to deviate from the plea agreement, the defendant will not be entitled to withdraw his plea.

Sincerely,

Ashley Whipple
Deputy County Attorney